

Local, personal and Health Impact

Hi, my name is Wade Jordan and I own Euleess Vapor and several other small vape related businesses in Bedford Texas.

This country is run off the backbone of small business. This is the first time in MY lifetime that I have seen anything like this, a growth of a new industry, it's amazing and exciting to be a part of something new, innovative and life changing for not only smokers to be able to transition from traditional tobacco to the vapor products presently on the market, but for them to be able to feel healthier in doing so.

In my store, I have 8 employees. In the Dallas/Fort Worth area, there are well over 600 vape shops and manufacturers that employ 1- 30 employees, many part time, that would not be eligible for unemployment if the FDA bill goes through as written. That would equate to a median average of 9-10,000 people who are no longer able to pay their bills, pay their mortgage, pay their car payment, buy food, buy Christmas or birthday presents or just have an evening on the town all of which help to spur the economy in the Dallas Metroplex alone.

Not only will the FDA deeming regulation affect us personally, but it will also affect our local city governments if it is passed the way it is written now. I pay an average of \$5,000.00 a month in State and Local Taxes, so over a period of 12 months, my company pays an average of \$60,000.00 a year in state and local taxes or an average of \$180,000.00 since we opened in 2013 .If we added in the 10 shops that are in my city, that is \$360,000.00 to \$600,000.00 a year in state and local taxes. That's over a million and a half dollars in the last three years. That's a lot of money for a small city to lose and have no way to recoup that money. Now we've gone past affecting more than just the vape industry.

The need for limited restriction or restriction free access to vape products is even more evident through medicaid spending. American adults who are uninsured or on Medicaid smoke at rates more than double those for adults with private health insurance or Medicare. 27.9 percent of uninsured adults and 29.1 percent of Medicaid recipients currently smoke. By contrast, 12.9 percent of adults with private insurance and 12.5 percent of those on Medicare currently smoke. According to CDC Director Tom Frieden, M.D., M.P.H "Smoking kills half a million Americans each year and costs more than \$300 billion." Brian King, Ph.D., deputy director for research translation, CDC Office on Smoking and Health said, "Barrier-free access to quitting help are made all that more important. They work to reduce the enormous health and financial burden of tobacco use and secondhand smoke exposure among Americans."

Based on the findings of a rigorous and comprehensive study (the study is in your packet for you to refer to) on the impact of cigarette smoking on medicaid spending, the potential savings of vapor adoption, and the resulting tobacco smoking cessation and

harm reduction, could have been up to \$48 billion in fiscal year 2012. This savings is 87% higher than all state cigarette tax collections and tobacco settlement collections (\$24.4 billion) collected in that same year. Clearly you can imagine the mass amounts saved by the simple switch to an affordable and successful alternative now in 2015 with the products presently on the market that are much more advanced and perform better and have a higher success rate.

The FDA Deeming Regulations as they are written will effect way beyond the Vapor industry. We would like to propose to the OMB that they ask the FDA to first and foremost support the change of the grandfather date to the date in which deeming regulations goes into effect, furthermore adding a sensible reasonable modified PMTA for which this industry can enter through. This could include something such as age restriction, warning labels, safety caps and list of acceptable ingredients. All of these are acceptable and sensible regulations for this industry to continue to grow and revolutionize without being stifled out of existence or costing local, state and national billions of lost dollars due to over regulation.

That's all i have and thank you for giving me the opportunity to speak to you about the impacts the FDA Regulations will have on my family, friends, state, local and National economy.